

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018

Date filed: March 12, 2019

Name of company covered by this certification: Super Net, Inc.

Form 499 Filer ID: 826133

Name of signatory: Robert Gessner

Title of signatory: President

I, Robert Gessner, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court systems, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed Robert Gessner

**CPNI Corporate Certification**  
**CPNI Policy Statement**

I, Robert Gessner, President, am a corporate officer of Super Net, Inc. Pursuant to 47 U.S.C. § 222; 47 C.F.R. §64.2009 of the Communications Act, I hereby state that I am responsible for company compliance with the FCC's CPNI rules and have personal knowledge that Super Net, Inc. is in compliance with the rules. Super Net, Inc.'s compliance is demonstrated in this CPNI Policy Statement.

I attest to the following:

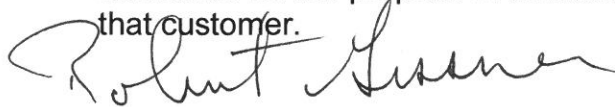
1. Our company utilizes an employee training program with a supervisory review process to ensure compliance with CPNI rules and regulations.
2. Our company maintains records of compliance for the minimum period as required by FCC rules and regulations.
3. Our company has a supervisory approval process in place for any proposed outbound marketing request for CPNI.
4. Our company has a notification process in place to alert law enforcement, the FCC and effected customers in the event of a CPNI breach.
5. Our company has a notification process in place for immediate notice to customers when a customer initiated password or back-up for forgotten passwords; an on-line account; or the address of record is created or changed.
6. Our company has a formal process in place to certify that CPNI protection policies have been instituted by our applicable vendors, service bureaus and wholesale carriers.



Robert Gessner  
March 12, 2019

### CPNI Checklist

- ✓ Super-Net, Inc. has chosen to prohibit the use of CPNI for marketing purposes between itself and its affiliates, if any.
- ✓ Super-Net Inc.'s Policy Manual(s) has/have been updated to include CPNI.
- ✓ Employees have been trained on the FCC CPNI rules and Super-Net's penalties for non-compliance and their signed acknowledgements have been obtained and filed.
- ✓ Employees who might need to access Customer Service Records (CSR) stored in the OSS of other carriers/service providers have been provided a copy of Super-Net's CSR Policy, including penalties for non-compliance, and their signed acknowledgements have been obtained and filed. (CSR Policy must require written customer authorization prior to accessing CSR data as part of the new customer sales procedure).
- ✓ Super-Net requires written approval for release of CPNI to third parties.
- ✓ Customer Notice and Authorization forms are readily available to Company employees / Compliance Officer for distribution to customers upon request.
- ✓ Super Net has chosen not to use authorized CPNI for marketing.
- ✓ Super Net has provided one-time notification to customers for use of CPNI.
- ✓ A Corporate Officer has been named as the Super Net CPNI Compliance Officer and will certify annually that Super Net, Inc. is in compliance with all Federal CPNI rules and will make the required annual filing to the FCC.
- ✓ Safeguards are in place with all third parties having access to Super Net customer data or responsibility for creation of Super Net customer data. All applicable parties have attested to their compliance with FCC CPNI Rules and their attestations are on file.
- ✓ Safeguards are in place to obtain the explicit consent of a customer before disclosing a customer's CPNI to a joint venture partner or independent contractor for the purpose of marketing communications-related services to that customer.



Robert Gessner  
March 12, 2019

